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December 21, 2007

FILED ELECTRONICALLY AND ORIGINAL VIA 1ST CLASS MAIL SERVICE

The Honorable Charles L.A. Terreni
Chief Clerk
South Carolina Public Service Commission
Post Office Drawer 11649
Columbia, South Carolina 29211

Re: Application of Syniverse Technologies, Inc. for a Certificate of Public Convenience and Necessity to Provide Resold and Facilities-Based Local Telecommunications Services and for Flexible Regulation

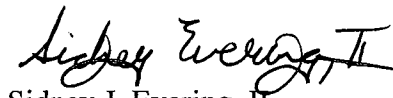
Dear Mr. Terreni:

Enclosed is the original and one (1) copy of the Application filed on behalf of Syniverse Technologies, Inc. in the above referenced matter.

Please acknowledge your receipt of this document by file-stamping the copy of this letter enclosed, and returning it in the enclosed envelope.

If you have any questions or need additional information, please do not hesitate to contact me.

Sincerely,



Sidney J. Evering, II

SJE

cc: Office of Regulatory Staff Legal Department
Enclosures

THIS DOCUMENT IS AN EXACT DUPLICATE, WITH THE EXCEPTION OF THE FORM OF THE SIGNATURE, OF THE E-FILED COPY SUBMITTED.

CHARLESTON, SC
CHARLOTTE, NC
MYRTLE BEACH, SC
RALEIGH, NC
SPARTANBURG, SC

STATE OF SOUTH CAROLINA**(Caption of Case)**

**Application of Syniverse Technologies, Inc. for a
Certificate of Public Convenience and Necessity to
Provide Resold and Facilities-Based Local
Telecommunications Services and for Flexible
Regulation**

**BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA**

COVER SHEET

DOCKET

NUMBER: _____ - _____ - _____

(Please type or print)

Submitted by: Sidney J. Evering, II

SC Bar Number: 70213

Address: Parker Poe Adams & Bernstein, LLP
1201 Main Street, Suite 1450
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NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

☐ **Emergency Relief demanded in petition** ☐ **Request for item to be placed on Commission's Agenda expeditiously**

☐ **Other:** _____

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)			
<input type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input type="checkbox"/> Letter	<input type="checkbox"/> Request	
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certification	
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation	
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement	
<input type="checkbox"/> Electric/Water/Telecom.	<input checked="" type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment	
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter	
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response	
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery	
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition	
<input checked="" type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation	
<input type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena	
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff	
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other:	
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest		
<input type="checkbox"/> Other:	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit		
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report		

**BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA**

In the Matter of Application of Syniverse)	
Technologies, Inc. for a Certificate of Public)	Docket No. _____
Convenience and Necessity to Provide Resold)	
and Facilities-Based Local Telecommunications)	
Services and for Flexible Regulation)	

SYNIVERSE TECHNOLOGIES, INC. ("Syniverse" or "Applicant"), by its undersigned counsel and pursuant to S.C. Code Ann. § 58-9-280(B) and Section 253 of the Telecommunications Act of 1996, 47 U.S.C. § 253, hereby submits this Application to the South Carolina Public Service Commission ("Commission") for a certificate of public convenience and necessity to offer resold and facilities-based local telecommunications within the State of South Carolina. In addition, Applicant requests the Commission regulate its local telecommunications services under the principles and procedures established for flexible regulation in Order No. 98-165 in Docket No. 97-467-C.

1. The name and address of Applicant are:

Syniverse Technologies, Inc.
8125 Highwoods Palm Way
Tampa, Florida 33647-1776
Telephone: (813) 637-5000
Facsimile: (813) 637-5731
Website: syniverse.com
Federal Identification Number (EIN): #06-1262301

2. All correspondence, notices and other communications regarding this Application should be directed to:

Sidney J. Evering, II
sidneyevering@parkerpoe.com
Parker Poe Adams & Bernstein LLP
1201 Main Street, Suite 1450
P.O. Box 1509
Columbia, South Carolina 29202
Telephone: (803) 255-8000

Facsimile: (803) 255-8017

and

Henry C. Campen, Jr.
henrycampen@parkerpoe.com
Parker Poe Adams & Bernstein LLP
Wachovia Capitol Center
150 Fayetteville Street, Suite 1400
P.O. Box 389
Raleigh, North Carolina 27602
Telephone: (919) 828-0564
Facsimile: (919) 834-4564

with copies to:

David J. Robinson
david.robinson@syniverse.com
Manager – Public Policy
Syniverse Technologies, Inc.
8125 Highwoods Palm Way
Tampa, Florida 33647-1776
Telephone: (813) 637-5940
Facsimile: (813) 637-5731

3. Contact person regarding ongoing operations of the Applicant is:

David J. Robinson
Manager – Public Policy
Syniverse Technologies, Inc.
8125 Highwoods Palm Way
Tampa, Florida 33647-1776
Telephone: (813) 637-5940
Facsimile: (813) 637-5731
david.Robinson@syniverse.com

Applicant's requested agent in South Carolina is:

C T Corporation System
c/o C T Corporation System
75 Beattie Place
Two Insignia Financial Plaza
Greenville, South Carolina 29601

4. Description of Applicant:

Syniverse is a corporation organized under the laws of the state of Delaware on January 8, 2002. The initial corporate name was TSI Telecommunication Network Services, Inc.. The Attached as **Exhibit A** is the Applicant's Articles of Incorporation. Also included as **Exhibit B** is the Certificate of Authority to transact business as a foreign corporation in South Carolina.

5. Customer Service:

Syniverse toll-free number for customer inquiries is (800) 892-2888. It is answered 24-hours per day/7 days per week. In addition, customers may contact the company in writing at the headquarters address and via email at david.Robinson@syniverse.com. The toll free number will be printed on customer's statements.

6. Financial, Managerial and Technical Ability:

Syniverse is financially qualified to provide competitive local exchange services in South Carolina. Syniverse is a public company traded on the New York Stock Exchange (SVR). Its most recent 10-K is included as **Exhibit C**. In particular, Syniverse has access to the financing and capital necessary to conduct its telecommunications operations as specified in this application. Syniverse's combined net income was \$328.9 million (USD) for the year ended December 31, 2006.

Syniverse has extensive telecommunications and managerial experience. Biographies of the Applicant's officers and directors are attached hereto as **Exhibit D**. Syniverse holds a certificate of public convenience and necessity to provide private line telecommunications services in South Carolina granted by the Commission by Order No.

2004-39 in Docket No. 2003-290-C. a copy of which is attached hereto as **Exhibit E**. The Commission issued an Order Approving Change of Company Name on December 15, 2006 in Docket No. 2003-290-C (Order No. 2006-743) to reflect the name change to Syniverse from the company's initial corporate name. Syniverse has authority to offer telecommunications services in thirty-six (36) states and authority to offer competitive local exchange services in eighteen (18) of those. Syniverse has not been denied requested certification in any jurisdiction, nor has it had a permit, license, or certificate revoked by any authority.

7. Designation of Services and Proposed Service Territory:

Syniverse intends to provide competitive local exchange access services, including dedicated transport, local numbering resources, resold switching services and facilities-based signaling in the State of South Carolina. Syniverse will offer local numbering resources to enable a "foreign exchange" type telecommunication service marketed to Tier 2 or Tier 3 carriers – allowing these rural and small carriers to offer their business customers the ability to reach customers in several larger urban markets. Syniverse proposes to offer resold and facilities-based local telecommunications services to other carriers and to end-user customers within the present operating areas of BellSouth Telecommunications, Inc. Applicant's proposed tariff is included as **Exhibit F**.

8. Public Interest and Need:

Approval of this application and Applicant's proposed tariff will serve the public interest by increasing competition for local telecommunications services. Increased competition benefits consumers by providing choice, improved service quality and price competition. The objective of the Telecommunications Act of 1996 was to foster competition in the

provision of local telecommunications services. This authority sought in this application is consistent with the objective of the Telecommunications Act of 1996.

The granting of Applicant's application is consistent with S.C. Code Ann. § 58-9-280(B), as amended by 1996 Act No. 354, and, in that regarding Applicant makes the following representations to the Commission:

- A. Applicant possesses the technical, financial, and managerial resources sufficient to provide the services requested;
- B. The provision of local service by Applicant will not adversely impact the availability of affordable local exchange service;
- C. Applicant's local services will meet the service standards required by the Commission;
- D. Applicant, to the extent it is required to do so by the Commission, will participate in the support of universally available telephone service at affordable rates; and,
- E. The provision of local service by Applicant will not adversely impact the public interest.

Syniverse will seek to enter into a stipulation with the South Carolina Telephone Coalition with respect to providing service in rural areas. Syniverse is not asking the Commission to make a finding at this time regarding whether competition is in the public interest for rural areas.

9. Waivers and Regulatory Compliance:

Applicant requests that the Commission grant it a waiver of those regulatory requirements inapplicable to competitive local service providers. Such rules are not appropriate for competitive providers and constitute an economic barrier to entry into the local exchange market.

- A. **Financial Recordkeeping:** Applicant requests that it be exempt from any financial recording rules or regulations that require a carrier to maintain its financial records in conformance with the Uniform System of Accounts (“USOA”). As a competitive provider, Applicant currently maintains its books and records in accordance with Generally Accepted Accounting Principles (“GAAP”). GAAP is used extensively by competitive local exchange carriers and interexchange carriers. Since Applicant utilizes GAAP, the Commission will have a reliable method by which to evaluate Applicant’s operations. Therefore, Applicant requests to be exempt from any and all USOA requirements of the Commission.
- B. **Maintenance of Books and Records:** In addition, Applicant requests a waiver of S.C. Reg. 103-610, and to be allowed to maintain its books and records at its headquarters location in Tampa, Florida. In the event that the Commission finds it necessary to review Applicant’s books, this information will be provided upon request to the Commission or Applicant will bear the expense of travel for the Commission staff to examine the books and records located outside of South Carolina.
- C. **Local Exchange Directories/Operating Map:** Applicant requests that it not be required to publish local exchange directories. Applicant will make arrangements with the incumbent LECs whereby the names of Applicant’s Customers will be included in the directories published by the incumbent LECs. These directories will be distributed to Applicant’s Customers. This approach is reasonable and

will have a direct benefit to the customers of both Applicant and the incumbent LECs since customers will have to refer to only one directory for a universal listing of customer information. It would be an unnecessary burden on the Applicant to require that it publish and distribute its own directory to all customers located within each exchange area, particularly since nearly all of these customers will be customers of the incumbent LECs. It is more efficient for Applicant to simply include its Customer list in the existing directories of the incumbent LECs. Applicant also requests that it not be required to file an operating area map since Syniverse will operate within the service area of BellSouth.

- D. **Reporting Requirements:** Applicant finally requests waivers of any reporting requirements which are not applicable to competitive providers such as Applicant because such requirements (a) are not consistent with the demands of the competitive market; or (b) they constitute an undue burden on a competitive provider, thereby requiring an ineffective allocation of resources.

Applicant reserves the right to seek any regulatory waivers which may be required for Applicant to compete effectively within the states' local exchange and resale market.

10. Flexible Regulation of Local Exchange Services:

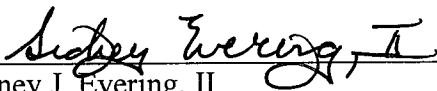
In Docket Number 97-467-C, the Commission approved a rate structure that incorporated maximum rate levels with the flexibility for adjustment below the maximum rate levels. The Commission determined that local tariff filings would be presumed valid upon filing, subject to the Commission's right within thirty days to institute an investigation of a tariff

filing and that any such tariff filings would be subject to the same monitoring process as similarly situated competitive local exchange carriers. Applicant submits that as a local exchange competitor it should be subject to regulatory constraints no greater than those imposed in the above mentioned docket. The Applicant requests that its local exchange service tariff filings be regulated under this form of flexible regulation.

11. Conclusion:

This Application demonstrates that the Company possesses the technical, financial and managerial resources to provide local exchange service within the State of South Carolina. Furthermore, granting this Application will promote the public interest by increasing the level of competition in the South Carolina telecommunications market. Ultimately, competition will compel all telecommunications service providers to operate more efficiently and pass the resulting costs savings on to consumers. In addition, as a result of competition, the overall quality of service will improve.

Respectfully submitted,



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Dated: December 20th, 2007